

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

NOAH LANDFRIED  
MARIO ALLEN  
LARRY BENAVIDES  
DASHAWN BURLEY  
MICHEL CERCONE  
AHMAD FLETCHER  
MICHAEL S. FRAWLEY  
CHRISTOPHER GAHAGAN  
RICHARD GEORGELOS  
NICHOLAS GIAMMICHELE  
ROBERT KORBE  
PRIYANKA KUMAR  
ROSS LANDFRIED  
STERLING MARSHALL  
DARREN MARTIN  
HAROLD NOVICK  
PAUL NUARA  
OMARI PATTON  
JAMES PERRY  
JOHN RAMSEY  
DONNELL STEWARD  
QUOC BOA TRINH  
ANGELO WILLIAMS  
TERRELL WILLIAMS  
RICHARD WOOD  
SHAYLA YATES  
KRYSTIAN ZARATE

Criminal No.

19-8

[UNDER SEAL]

MOTION FOR ARREST WARRANTS

AND NOW comes the United States of America, by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Craig W. Haller, Assistant United States Attorney for said District, and, pursuant to Rule 9 of the Federal Rules of Criminal Procedure, respectfully moves the Court to issue an Order directing that Arrest Warrants be issued for the apprehension of defendants NOAH LANDFRIED, MARIO ALLEN, LARRY BENAVIDES, DASHAWN BURLEY, MICHEL CERCONE, AHMAD FLETCHER, MICHAEL

S. FRAWLEY, CHRISTOPHER GAHAGAN, RICHARD GEORGELOS, NICHOLAS GIAMMICHELE, ROBERT KORBE, PRIYANKA KUMAR, ROSS LANDFRIED, STERLING MARSHALL, DARREN MARTIN, HAROLD NOVICK, PAUL NUARA, OMARI PATTON, JAMES PERRY, JOHN RAMSEY, DONNELL STEWARD, QUOC BOA TRINH, ANGELO WILLIAMS, TERRELL WILLIAMS, RICHARD WOOD, SHAYLA YATES, AND KRYSTIAN ZARATE upon the grounds that an Indictment has been returned in the above-captioned criminal case charging the defendants with violating Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C); and Title 18, United States Code, Sections 1956(h) and 1952(a)(3).

Recommended bond: Detention.

Respectfully submitted,

SCOTT W. BRADY  
United States Attorney

By: s/Craig W. Haller  
CRAIG W. HALLER  
Assistant U.S. Attorney  
PA ID No. 87714